



State of Illinois

ENVIRONMENTAL PROTECTION AGENCY

REC'D  
FEB 27 1997  
W. J. B.

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February 25, 1997

Mr. Michael Bellot  
U.S. Environmental Protection Agency  
77 West Jackson Blvd., SR-6J  
Chicago, Illinois 60604-3590

**Re: L0971900017 Lake Co.  
Waukegan Harbor/OMC  
Superfund/Tech**

Dear Mr. Bellot:

Please find enclosed the IEPA's comments on the revised "Operation and Maintenance Plan" dated January 1997 for the Outboard Marine Corporation Superfund Site.

If you have any questions or comments please contact me.

Sincerely,

Gerald E. Willman  
Project Manager  
Remedial Project Management Section  
Bureau of Land

cc: Div. File

US EPA RECORDS CENTER REGION 5



399194

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Revised Operation and Maintenance Plan Comments

- 1) Page 2, Last paragraph  
This paragraph states that PNA contaminants found during construction of the new slip, relate to another site, the Waukegan Manufactured Gas and Coke Plant Site, which is being investigated and remediated separately. This statement is inappropriate for the following reasons:
  - The Waukegan Manufactured Gas and Coke Plant is an operable unit of the Outboard Marine Corp. Site, and is not a totally distinct and separate site; and,
  - After OMC dismantled the Coke Plant in approximately 1972, it stored waste oil and petroleum products on the site. These activities call into question this statement's insinuation that the PNA contaminants only relate to the Coke Plant.
- 2) Page 3, 1st paragraph  
OMC has accepted the fact that it is responsible for the O&M of the stockpile. However, future responsibility for the stockpile and its final disposition has not been fully established.
- 3) Page 3, 2nd paragraph  
This paragraph incorrectly summarizes that language which is contained in Section V.D.9 of the Consent Decree. The Consent Decree states that "at any time after 5 years following the commencement of operation and maintenance activities for any containment cell, OMC or the Trustee may request that U.S. EPA (with the concurrence of IEPA) modify or terminate the groundwater extraction, treatment, and discharge activities required by Section 4.C of the Operation and Maintenance Plan for that cell" This language indicates that the U.S. EPA can not simply modify or terminate any activities at any time. This paragraph should be revised to be more specific.
- 4) Page 4, 3rd paragraph  
This paragraph states that the vegetative cover will be inspected annually. The existing O&M plan states that "the vegetative cover will be inspected, every three months during the first two years after completion of closure, semi-annually for the next two years and each spring during the remainder of the post-closure care period. From information provided within the Construction Complete Report, it appears that the completion dates for the West, East, and Slip-3 containment cells were May 1993, August 1993, and December 1994 respectively. Accordingly, as of the date of this document, all three cells should be inspected semi-annually.
- 5) Page 5, Section 3.2 Groundwater Sampling, Analysis, and Notifications  
This section discusses PCB levels and activities which will result due to such levels. Neither the existing O&M plan or this revision specify that **total** PCBs is the measure by which activities are triggered within the O&M plan. In 1995 several discussions were held between U.S.EPA and OMC regarding the different Aroclors detected at the site during 1995.



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Specifically, the U.S.EPA's comments on PCB data, dated 4/11/95 and OMC's response to these comments dated 5/12/95, discuss these issues..

- 6) Page 6, paragraph 1. Hazardous Constituents  
OMC's quarterly report dated December 9, 1996 stated that several VOC's were detected in monitoring wells 5,6,9, and 10. The report indicated that "(VOC) samples are not required for the project". However, the existing O&M plan states that "groundwater monitoring will be for PCBs and chlorinated organics". This reference should be included in the Revised O&M plan. In fact, regular quarterly analysis of VOCs should be considered due to the detections from the October 11 sampling.
- 7) Page 7, first bullet  
The monitoring data record should show the original sampling result in some fashion regardless of the re-sampling result. In the past OMC has included the original result as a footnote. At the least, this practice should continue.
- 8) Page 7, third paragraph  
The second sentence of this paragraph seems confusing. It appears to be saying that if the original detection monitoring result is greater than 10 ppb above background, the USEPA will be notified by phone within 24 hours of confirmation. Specifically, the word "change" is unclear (i.e. change from what to what?).
- 9) Page 12, 4th paragraph  
The O&M plan should explain how the proposed testing procedure for TRC meets the substantive requirements of 40 CFR 136.
- 10) Table 2  
According to Table 8 of OMC's Quarterly Report for period ending 12/31/94, the first round of sampling completed on the East Containment Cell was the 2nd quarter of 1993, not the 3rd quarter of 1992 as it is presented within this table.

Also, it appears that the average background for W-10 and W-12 should be 18.6 and 1.5 respectively.